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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

In re:

STEPHEN VICTOR LONG,

Debtor.

Bankruptcy No. 10-35248 WTT
(Chapter 7)

FILED ELECTRONICALLY

MOTION FOR TURNOVER ORDER

Trustee Stephen W. Rupp ("Trustee"), as trustee of the Chapter 7 bankruptcy estate of Debtor Stephen Victor Long ("Debtor"), by and through undersigned counsel, hereby moves the Court for an order requiring Debtor to turnover copies of his prepared and filed Federal and State tax returns for tax years 2008, 2009, 2010, and 2011. In support of this motion, Trustee represents as follows:

1. Debtor commenced the above-captioned bankruptcy case, case no. 10-35248, by filing a voluntary petition for relief under Chapter 7 of the United States Bankruptcy Code (11

U.S.C. § 101 *et seq.*) on November 2, 2010 (the "Petition Date") in the United States Bankruptcy Court for the District of Utah, Central Division.

2. Trustee is the duly appointed, qualified, and acting Chapter 7 trustee of Debtor's bankruptcy estate.

3. On November 30, 2010, Debtor, through counsel, submitted to Trustee copies Debtor's 2008 and 2009 federal and state tax returns. Debtor's counsel indicated the tax returns were the "most recent tax returns filed" by Debtor.

4. Debtor's 341 meeting was conducted on December 10, 2010.

5. At the 341 meeting, Trustee issued a directive to Debtor directing him to supply Trustee with full and complete copies of prepared and filed State and Federal tax returns for tax years 2006, 2007, 2008, and 2009 on or before December 17, 2010. Trustee also directed Debtor to supply him with full and complete copies of prepared and filed State and Federal tax returns for tax year 2010 no later than February 15, 2011.

6. On December 17, 2010, Debtor's counsel sent an e-mail to Trustee with copies of Debtor's 2006 and 2007 tax returns. The e-mail implied the tax returns had been filed. Debtor's counsel also reminded Trustee that he had already provided copies of prepared and filed tax returns for tax years 2008 and 2009.

7. Trustee has confirmed with the IRS that Debtor has **not** filed tax returns for tax years 2008, 2009, 2010, or 2011.

8. Accordingly, to date Debtor has not complied with Trustee's directive because he has not turned over copies of **filed** tax returns for tax years 2006, 2007, 2008, 2009, and 2010.

9. Trustee does not believe Debtor has filed Federal or State tax returns for tax years 2006 through present.

WHEREFORE, Trustee hereby requests an order of the court requiring Debtor to turn over full and complete copies of prepared and filed Federal and State tax returns for tax years 2008, 2009, 2010, and 2011.

DATED this 23rd day of January, 2014.

MCKAY, BURTON & THURMAN, P.C.

/s/ Mark C. Rose
Mark C. Rose
Attorneys for Stephen W. Rupp, Trustee